April 10th, 2004

Federal Communications Commission

Electronic Comment Filing System

RE: Docket response for public commentary to ET Docket 04-37

In support of the Amateur Radio Relay League public non-support statements concerning BLP discourse and in full support to the FEMA supporting documentation concerning disruptive elements of BLP proliferation. I follow further upon the public' commentary period as supported by the Federal Communications Electronic Filing System public comment period.

I urge and support no further implementation of BLP due to the severely disruptive nature of radio interference and unacceptable levels of noise and ground loop interference with currently operating frequency allocations for high frequency radio communications as these elements con not co-exist within the same context of this style and proliferation of high speed internet access. This style does not inherently provide any filtering of ground loop and grounding prevention when high speed internet is implemented upon the backbone of energy transmission lines. And when left piggybacked on an electrical implementation not remotely designed to neither accommodate nor facilitate this type of implementation without propagating severely disruptive noise and high frequency chattering noise upon many radio broadcasting networks.

I remain opposed as the primary broadcasting operator of Auxiliary United States Air Force Civil Air Patrol high frequency communications operations, Military Affiliate Radio Service Operator (MARS) operator, and Radio Amateur Radio Emergency Service (RACES) operator sanctioned by the FCC. As a licensed amateur radio operator it is my responsibility to report on such problems when they occur. Computer networks are susceptible to the same noise and are heavily grounded and shielded. The amount and type of noise and disruption occurring on any of these channeled high frequency radio networks would disable and disrupt these radio broadcasting networks beyond commonly accepted usage or reliance as emergency communications providers.

These providers form the backbone of our Nations Incident Management System (NIMS) just updated and released for FEMA utilization and distribution on March 1st 2004 where communications networks are mentioned. BLP implementation causes disruptive noise by the very nature of the implementation and we have just fixed the emergency out of frequency problems and are now faced with another disruptive element in out emergency providers of first and secondary responders.

On the surface the BLP appears to have beneficial and potentially marketable properties. However, upon closer monitored examination and under commonly accepted operating conditions the ground plane noise and disruptive propagation renders high

frequency radio broadcasting inoperable and useless for verbal communications. BLP noise levels can not be considered easily noise canceling on freely operating radio frequencies especially when tethered to alternating current poser supplies.

The disruption renders communications of voice or data unacceptably out of tolerance. Image driving under power lines with AM radio and now adding another layer of highly propagating noisy high speed internet not designed for such usage as a carrier backbone element. There are no universal international acceptable regulations of such high power energy transmission lines utilizing BLP and this is not yet acceptable implementation as already implemented in targeted testing geographic areas. Does the United States need to be subjected to further regulation or technologically unacceptable innovation? Imagine if power blackouts could be further propagated by this style of BLP utilization or even terrorism by illegal usage of some internet applications?

It is my professional opinion that the United States Federal Communication Commission should carefully examine the cost benefit and risk analysis of BLP's further impingement upon radio broadcasting and emergency communications radio broadcasting networks. Until such time that complete isolation from ground plane interference and noise cancellation can be documented not only in theoretical and practicum before allowing the BLP phenomena to continue at the current schedule of implementation without regulation of properties associated to current ARRL examples of noise and interference of radio HF broadcasts and UHF and VHF radio broadcasts.

With the greatest respect and authority

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